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Attorneys for Defendant
 SEIU LOCAL 87

Attorneys for Plaintiffs
 MARIA HERRERA, *et al.*
 (Additional counsel listed below)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARIA HERRERA, MARIA ALVAREZ,
 SALVADOR GALLARDO, MARIA VEGA,
 TARCISIO VEGA, JOSE TASAYCO, OLGA
 LOAIZA, ESPERANZA J. LOPEZ,
 MANUAL LOPEZ, JOSE A. LUNA,
 RUTILIO RIVAS, and CAROLINA
 RODRIGUEZ, individually and on behalf
 of all others similarly situated,

Plaintiffs,

vs.

SERVICE EMPLOYEES
 INTERNATIONAL UNION LOCAL 87,
 SERVICE EMPLOYEES
 INTERNATIONAL UNION, and DOES 1
 through 10, inclusive,

Defendants.

Case No. C10-01888 RS

**STIPULATION RE EXTENSION OF
 TIME TO FILE OPPOSITION TO
 MOTION FOR CLASS
 CERTIFICATION; ~~[PROPOSED]~~
 ORDER AS MODIFIED BY THE COURT**

Hearing Date: November 29, 2012

Judge: Hon. Richard Seeborg
 Courtroom: 3

Plaintiffs MARIA HERRERA, MARIA ALVAREZ, SALVADOR GALLARDO,
 MARIA VEGA, TARCISIO VEGA, JOSE TASAYCO, OLGA LOAIZA, ESPERANZA J.
 LOPEZ, MANUAL LOPEZ, JOSE A. LUNA, RUTILIO RIVAS, and CAROLINA
 RODRIGUEZ, and defendant SERVICE EMPLOYEES INTERNATIONAL UNION

1 LOCAL 87 hereby stipulate and request an order changing time, pursuant to Civil Local
2 Rules 6-2 and 7-12, as follows:

- 3 1. Due to an unforeseen family medical emergency regarding his wife's
4 pregnancy, as of October 30, 2012, attorney for defendant SEIU Local 87
5 Kevin Brunner of the law firm Siegel & Yee is unable to prepare defendant's
6 opposition to plaintiffs' pending renewed motion for class certification, filed
7 October 23, 2012. Kevin Brunner was, until this moment, the primary acting
8 attorney for defendant SEIU Local 87 in this matter, as well as the principal
9 lawyer charged with preparing defendant's opposition. Although two other
10 attorneys from Siegel & Yee have appeared in this matter, Dan Siegel and
11 Jane Brunner, neither is available to prepare opposition to the pending
12 motion by November 6, 2012, the current deadline for defendant's opposition.
13 Jane Brunner is unavailable because she has taken a leave of absence from
14 Siegel & Yee in order to conduct a political campaign for the elected position
15 of City Attorney of Oakland, California. Dan Siegel, although he will still act as
16 defendant's trial counsel in this matter, is not presently briefed on the
17 detailed factual matters underlying plaintiffs' motion, and is also unavailable
18 to prepare the opposition due to multiple scheduled conflicts, including a
19 hearing in the Eastern District and several depositions. After Dan Siegel and
20 Siegel & Yee learned of Kevin Brunner's unexpected and indefinite absence
21 from Siegel & Yee, attorney Michael Siegel was assigned to the case. Upon
22 receiving this assignment, Michael Siegel contacted opposing counsel Michael
23 Strimling on October 30, 2012, to request an extension of three weeks, or
24 more, to file papers in opposition to class certification. The parties hereby
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1 propose that defendant's time to file an opposition be extended until
2 November 27, 2012.

- 3 2. Hearing on plaintiffs' renewed motion for class certification is currently
4 scheduled for November 29, 2012, at 1:30 p.m. This hearing date has not been
5 rescheduled, prior to this request. The parties hereby propose that hearing on
6 the renewed motion be rescheduled for January 10, at 1:30 p.m., with the
7 reply brief of plaintiffs to be due on December 18, 2012, so that all these dates
8 do not to conflict with planned holidays.
9
10 3. The parties do not anticipate that this requested time modification will have
11 an effect on the schedule for this case.
12

13 Dated: October 30, 2012
14

15 SIEGEL & YEE

16 By: /s/ Michael Siegel

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By: /s/ Michael Strimling

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ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Michael S. Strimling, attest that concurrence in the filing of this document has been obtained from each of the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 30th day of October, 2012 at Walnut Creek, California.

/s/ Michael Strimling

ORDER

The above stipulation having been considered, and good cause appearing therefore, IT IS SO ORDERED. Defendant SEIU may have until November 27, 2012 for filing and service of its opposition brief; plaintiffs shall have until December 18, 2012,

1 for filing and service of the reply brief; and the date for hearing for the Motion to Certify
2 previously set for November 29, 2012, is hereby continued until January ^{17,}~~10,~~ 2013 at
3 1:30 p.m.
4

5
6 DATED: 11/1/12



RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE